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July 7, 2005

VIA HAND DELIVERY

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

**Re: Petition of MCImetro Access Transmission Services, LLC for Arbitration
of Certain Terms and Conditions of Proposed Agreement with Horry
Telephone Cooperative, Inc. Concerning Interconnection and Resale
under the Telecommunications Act of 1996
Docket No. 2005-188-C**

Dear Mr. Terreni:

I am writing to express the opposition of Horry Telephone Cooperative, Inc. ("HTC") to the Petition to Intervene filed in the above-referenced matter by Time Warner Cable Information Services, LLC ("TWCIS"). We respectfully request that the Public Service Commission of South Carolina ("Commission") deny TWCIS' request to intervene in this arbitration proceeding between MCImetro Access Transmission Services, LLC ("MCI") and HTC, for the reasons stated herein.

Arbitration proceedings, pursuant to Sections 252 of the Telecommunications Act of 1996 (the "Act"), are not like the typical contested cases that the Commission presides over pursuant to the South Carolina Administrative Procedures Act. Instead, arbitration proceedings are a method used by two parties who have been unable to come to an agreement through negotiation. Arbitration proceedings are conducted by the Commission to assist the parties in resolving the differences they have identified through the negotiation process in order to reach a final agreement between the parties. In other words, they are the culmination of the negotiation process contemplated under Sections 251 and 252 of the Act. Arbitration proceedings relate to a particular agreement and to the particular parties to that agreement. The fact that a third party may be interested in the issues or even, as TWCIS asserts, be interested in the final agreement itself, does not mean that those third parties should be permitted to participate in an arbitration proceeding. It is simply not appropriate for any person or entity that is not a party to the agreement and, therefore, did not participate in the

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negotiations, to participate as a party to the arbitration proceeding. The negotiation process has taken place without TWCIS' involvement and it would not be appropriate to interject TWCIS into the middle of the process now.

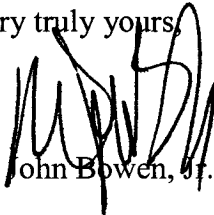
The Commission has previously denied a Petition to Intervene filed by TWCIS in a recent similar proceeding involving arbitration between MCI and Farmers Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT Telcom, Inc., and Hargray Telephone Company. See Commission Order No. 2005-233 in Docket No. 2005-67-C. The Petition to Intervene filed by TWCIS in that docket raised the same arguments TWCIS raises here. As the Commission correctly found, TWCIS is not a proper party of record to a proceeding for arbitration of an agreement to which TWCIS is not a party. As in the prior arbitration, TWCIS' status in the instant proceeding is that of a mere potential future customer of MCI in HTC's service area. While TWCIS asserts that its intervention is "necessary to protect its interests in this matter," it is not a party to the agreement between MCI and HTC. If the Commission were to grant TWCIS' intervention in this matter, any customer or potential customer of any carrier that is the subject of a future arbitration proceeding could argue that it likewise has an interest in the outcome of that proceeding. As the Commission has previously recognized, the purpose of an arbitration proceeding is to resolve specific disputed issues between two parties to an agreement, not to provide a public forum for the discussion of those issues.

For the reasons discussed herein, we respectfully request that the Commission deny the Petition to Intervene filed by TWCIS in this arbitration proceeding between MCI and HTC.

Please clock in a copy of this letter and return it with our courier.

Thank you for your assistance.

Very truly yours,



M. John Bowen, Jr.

cc: Parties of Record
Frank R. Ellerbe, III